

EXHIBIT 356

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF OHIO

EASTERN DIVISION

-----) MDL No. 2804

IN RE: NATIONAL PRESCRIPTION)

OPIATE LITIGATION)

-----) Case No. 17-md-2804

THIS DOCUMENT RELATES TO:)

ALL CASES)

-----) Hon. Dan A. Polster

HIGHLY CONFIDENTIAL

SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

VIDEOTAPED DEPOSITION OF

DEBORAH BISH

February 1, 2019

Toledo, Ohio

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<p>1 2 3 4 5 The videotaped deposition of DEBORAH BISH, 6 called by the Plaintiffs for examination, taken 7 pursuant to the Federal Rules of Civil Procedure of 8 the United States District Courts pertaining to the 9 taking of depositions, taken before JULIANA F. 10 ZAJICEK, a Registered Professional Reporter and a 11 Certified Shorthand Reporter, at the Renaissance 12 Toledo Downtown Hotel, 444 North Summit Street, 13 Toledo, Ohio, on February 1, 2019, at 8:06 a.m. 14 15 16 17 18 19 20 21 22 23 24</p>	<p>1 APPEARANCES: (Continued) 2 ON BEHALF OF ENDO HEALTH SOLUTIONS INC., ENDO 3 PHARMACEUTICALS INC., PAR PHARMACEUTICAL, INC. AND PAR 4 PHARMACEUTICAL COMPANIES, INC. (FKA PAR PHARMACEUTICAL 5 HOLDINGS, INC.): 6 7 ARNOLD & PORTER KAYE SCHOLER LLP 8 70 West Madison Street, Suite 4200 9 Chicago, Illinois 60602-4231 10 312-583-2435 11 BY: CAITLIN MARTINI MIKA, ESQ. 12 (Telephonically) 13 caitlin.mika@arnoldporter.com 14 15 ON BEHALF OF WALMART INC.: 16 JONES DAY 17 77 West Wacker Drive 18 Chicago, Illinois 60601-1692 19 312-269-4164 20 BY: PATRICK J. BEISELL, ESQ. (Telephonically) 21 pbeisell@jonesday.com 22 23 ON BEHALF OF HBC SERVICES: 24 MARCUS & SHAPIRA LLP One Oxford Centre, 35th Floor Pittsburgh, Pennsylvania 15219 412-471-3490 BY: DARLENE M. NOWAK, ESQ. (Telephonically) nowak@marcus-shapira.com ALSO PRESENT: MS. KATIE MAYO, Levin Papantonio Thomas Mitchell Rafferty & Proctor P.A. MR. MICHAEL TOTH, Trial Technician THE VIDEOGRAPHER: MR. MICHAEL NEWELL, Golkow Litigation Services.</p>
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<p>1 APPEARANCES: 2 ON BEHALF OF THE PLAINTIFFS: 3 LEVIN PAPANTONIO THOMAS MITCHELL 4 RAFFERTY & PROCTOR P.A. 5 316 South Baylen Street, Suite 600 6 Pensacola, Florida 32502 7 205-396-3982 8 BY: JEFF GADDY, ESQ. 9 jgaddy@levinlaw.com 10 11 ON BEHALF OF WALGREEN CO.: 12 13 BARTLIT BECK LLP 14 54 West Hubbard Street, Suite 300 15 Chicago, Illinois 60654 16 312-494-4400 17 BY: KATHERINE M. SWIFT, ESQ. 18 kate.swift@bartlit-beck.com 19 20 ON BEHALF OF AMERISOURCEBERGEN CORPORATION and 21 AMERISOURCEBERGEN DRUG CORPORATION: 22 JASZCZUK, P.C. 23 311 South Wacker Drive, Suite 3200 24 Chicago, Illinois 60606 312-442-0509 BY: MARGARET M. SCHUCHARDT, ESQ. mschuchardt@jaszczuk.com ON BEHALF OF McKESSON CORPORATION: TABET DIVITO & ROTHSTEIN LLC 209 South LaSalle Street, 7th Floor Chicago, Illinois 60604 312-762-9461 BY: KYLE A. COOPER, ESQ. (Telephonically) kcooper@tdrlawfirm.com</p>	<p>1 INDEX 2 WITNESS: PAGE: 3 DEBORAH BISH 4 EXAM BY MR. GADDY..... 10 5 EXAM BY MS. SWIFT: 475 6 FURTHER EXAM BY MR. GADDY..... 493 7 8 ***** 9 10 EXHIBITS 11 WALGREENS - BISH EXHIBIT MARKED FOR ID 12 No. 1 4/5/12 E-mail chain, Subject: 16 Jupiter/Perrysburg C2 Orders; 13 WAGMDL00751658 - 659 14 No. 2 6/28/12 E-mail chain with 19 attachment, Subject: FW: Czar doc 15 from S. Thoss; WAGMDL00317097 - 098 16 17 No. 3 Deborah Bish LinkedIn page 27 18 19 No. 4 Annual Performance Review, 9/1/11 43 - 8/31/12, Deborah Bish 20 No. 5 Printout from the DEA website re 65 Title 21 CFR Part 1301, Section 21 1301.74 22 No. 6 Documents titled "Handling 74 Suspicious Drug Orders," 23 Originated 9/8/98, Revised 2/15/05 and "Handling Suspicious Orders 24 and Loss of Controlled Drugs," Originated 9/8/98, Revised 2/15/05; WAG00001910 - 911</p>

<p style="text-align: right;">Page 70</p> <p>1 would have occurred to you to do?</p> <p>2 MS. SWIFT: Object to the form.</p> <p>3 BY THE WITNESS:</p> <p>4 A. Probably not because we didn't fill the</p> <p>5 orders that were odd or large. You know, when I</p> <p>6 called the store, like I said, there was only one case</p> <p>7 that I remember that they actually said, Yes, I really</p> <p>8 want 80 of those or whatever. So, no, there was -- I</p> <p>9 wouldn't have thought of calling them.</p> <p>10 BY MR. GADDY:</p> <p>11 Q. Okay. Well, when you say "orders that</p> <p>12 were odd or large," I mean, you -- you shipped to -- I</p> <p>13 think we just saw over 5,000 different stores,</p> <p>14 correct?</p> <p>15 A. Um-hum, um-hum.</p> <p>16 Q. And I'm sorry. You have to say yes or no</p> <p>17 for her.</p> <p>18 A. Oh, yes. Sorry.</p> <p>19 Q. And is it fair to say that -- that those</p> <p>20 stores are in all different types of markets?</p> <p>21 A. Right, that's fair to say, yeah.</p> <p>22 Q. For example, there is a Walgreens in</p> <p>23 Perrysburg, is -- is there?</p> <p>24 A. Yes, um-hum.</p>	<p style="text-align: right;">Page 72</p> <p>1 received?</p> <p>2 A. No.</p> <p>3 Q. So when you say you didn't fill the orders</p> <p>4 that were odd, that would mean the orders that jumped</p> <p>5 off the page as being very large and would require a</p> <p>6 follow-up phone call to the store to make sure that</p> <p>7 they didn't make an error when they were typing in</p> <p>8 their order?</p> <p>9 MS. SWIFT: Object to the form.</p> <p>10 BY THE WITNESS:</p> <p>11 A. Well, to make sure that they didn't make</p> <p>12 an error or that they didn't really need it. But,</p> <p>13 like I said, again, there was only one case where I</p> <p>14 recall them actually saying, Yes, that's what I need.</p> <p>15 BY MR. GADDY:</p> <p>16 Q. Okay. Usually it was, Oh, shoot. I meant</p> <p>17 3 and I typed 300?</p> <p>18 A. Usually, yeah.</p> <p>19 Q. And in those cases you would just delete</p> <p>20 the 300 and put in a 3?</p> <p>21 A. Right.</p> <p>22 Q. It goes on to say in paragraph (b), it</p> <p>23 says:</p> <p>24 "Suspicious orders include orders of</p>
<p style="text-align: right;">Page 71</p> <p>1 Q. Okay. There is Walgreens in Cleveland,</p> <p>2 correct?</p> <p>3 A. Yes.</p> <p>4 Q. Chicago?</p> <p>5 A. Yep.</p> <p>6 Q. So there is Walgreens in -- in big cities,</p> <p>7 Walgreens in small towns, correct?</p> <p>8 A. Right, yes.</p> <p>9 Q. When you were looking at these orders, did</p> <p>10 you do any evaluation of the population size that --</p> <p>11 that these stores were serving?</p> <p>12 A. No.</p> <p>13 Q. Did you do any evaluation of how far the</p> <p>14 patients were traveling to get to those stores to have</p> <p>15 their prescriptions filled?</p> <p>16 A. No.</p> <p>17 Q. Did you do any evaluation of the numbers</p> <p>18 and types of doctors that were writing the</p> <p>19 prescriptions for these C-II drugs?</p> <p>20 A. No.</p> <p>21 Q. Okay.</p> <p>22 Every time that an order came in, did</p> <p>23 you -- did you do an historical analysis on that</p> <p>24 particular store for every single order that you</p>	<p style="text-align: right;">Page 73</p> <p>1 unusual size, orders deviating substantially from a</p> <p>2 normal pattern, and orders of unusual frequency."</p> <p>3 Do you see that?</p> <p>4 A. Um-hum.</p> <p>5 Q. Prior to just now, right here today in</p> <p>6 this deposition, had you ever read that subsection of</p> <p>7 this regulation before?</p> <p>8 A. I don't remember. I don't remember if I</p> <p>9 did or not.</p> <p>10 Q. Okay. Do you recall anybody at Walgreens</p> <p>11 ever giving you any training regarding this topic?</p> <p>12 A. Regarding orders deviating substantially</p> <p>13 all -- from a normal pattern, that -- no, because,</p> <p>14 again, that's something that I thought was done at</p> <p>15 corporate. They have all of the sales history. In</p> <p>16 the DCs we don't have that.</p> <p>17 Q. Okay. But you were the C-II function</p> <p>18 manager at Perrysburg, correct?</p> <p>19 A. Yep, yep.</p> <p>20 Q. Okay. And you were the person, I think,</p> <p>21 that Mr. Joseph said that your knowledge of C-IIs was</p> <p>22 second to none, correct?</p> <p>23 A. Um-hum, yes.</p> <p>24 Q. Okay. Let me show you another policy that</p>

<p style="text-align: right;">Page 110</p> <p>1 A. Um-hum.</p> <p>2 Q. And it talks about training?</p> <p>3 A. Yes.</p> <p>4 Q. And it says in No. 1, it says:</p> <p>5 "The SAIL function manager will be</p> <p>6 responsible for the training and enforcement of all</p> <p>7 the procedures."</p> <p>8 Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. Are -- are you aware of -- of any training</p> <p>11 ever being provided on this policy to any of the team</p> <p>12 members at Perrysburg?</p> <p>13 A. I'm not aware of this written policy being</p> <p>14 given to anyone, the team members, if that's -- that's</p> <p>15 what you are asking me.</p> <p>16 Q. Okay. Do you recall any -- there being</p> <p>17 any training or guidance given to, whether it's --</p> <p>18 it's the folks in the computer room or the pickers on</p> <p>19 what they are supposed to be looking for as far as</p> <p>20 contacting you about these questionable orders that --</p> <p>21 that you might need to check for accuracy?</p> <p>22 A. Well, they just -- they just knew that if</p> <p>23 it was -- they knew what was high because they picked</p> <p>24 every day and they picked all stores every week, so</p>	<p style="text-align: right;">Page 112</p> <p>1 A. No, that's not what I'm telling you.</p> <p>2 Q. Okay. You are just saying as a whole</p> <p>3 chain wide they're -- they're aware of what comes in?</p> <p>4 A. They -- they are aware of what was</p> <p>5 unusually large.</p> <p>6 Q. On a chain-wide basis?</p> <p>7 A. On a chain-wide basis, yes.</p> <p>8 Q. You -- do you see any -- any potential</p> <p>9 problems or issues with using a chain-wide basis to</p> <p>10 evaluate size of -- sizes of orders?</p> <p>11 MS. SWIFT: Object to the form.</p> <p>12 BY THE WITNESS:</p> <p>13 A. Well, I mean, every store would be</p> <p>14 different based on where it's at. Some were in</p> <p>15 hospitals, some were in corporate offices, so...</p> <p>16 BY MR. GADDY:</p> <p>17 Q. And -- and you would agree with me, it</p> <p>18 would be fair to say that a -- that a store at a</p> <p>19 hospital is probably going to need more C-IIs than a</p> <p>20 store in Perrysburg, Ohio?</p> <p>21 A. Possibly, that would make sense.</p> <p>22 Q. And -- and you agree with me that it would</p> <p>23 be possible that there could be an unusually large</p> <p>24 number of bottles for Perrysburg, but that might be a</p>
<p style="text-align: right;">Page 111</p> <p>1 they knew if something was unusually high. There</p> <p>2 wasn't really training given to them to identify that.</p> <p>3 Q. Did you -- I mean, they're -- you are --</p> <p>4 this is talking about over 5,000 stores, right?</p> <p>5 A. Um-hum.</p> <p>6 Q. Would -- would it be safe to say that you,</p> <p>7 when you see a store number, do you know what store</p> <p>8 that is?</p> <p>9 A. No.</p> <p>10 Q. Okay. So if you see, I want to say the</p> <p>11 store numbers were five digits?</p> <p>12 A. Correct.</p> <p>13 Q. So -- so if you saw Store 12345, that</p> <p>14 doesn't -- you don't know that -- that, Oh, we're</p> <p>15 talk -- that's the store in Perrysburg, Ohio, you</p> <p>16 don't particularly know where that store is or what</p> <p>17 population it serves or -- or what its typical</p> <p>18 business is or anything like that, is that correct?</p> <p>19 A. That's correct.</p> <p>20 Q. Okay. So when you say the pickers do this</p> <p>21 every day and they know what they are seeing, you are</p> <p>22 not telling me that -- that they know exactly how many</p> <p>23 bottles Store 12345 typically gets on an average</p> <p>24 order, are you?</p>	<p style="text-align: right;">Page 113</p> <p>1 normal order of bottles for a hospital, is that fair?</p> <p>2 A. That would be fair, um-hum.</p> <p>3 Q. Okay. But you didn't have a daily</p> <p>4 practice of calling all of the Walgreens stores and</p> <p>5 hospitals, did you?</p> <p>6 A. No.</p> <p>7 Q. Okay. So these or -- these orders that</p> <p>8 were going to hospitals, those weren't popping on a</p> <p>9 daily basis for you to follow up on, were they?</p> <p>10 MS. SWIFT: Objection; foundation.</p> <p>11 BY THE WITNESS:</p> <p>12 A. No.</p> <p>13 BY MR. GADDY:</p> <p>14 Q. Okay. So what you would see is normal</p> <p>15 orders for stores in a hospital setting were not high</p> <p>16 enough to flag for you to do any follow-up calls or</p> <p>17 investigation on, is that correct?</p> <p>18 MS. SWIFT: Objection; foundation.</p> <p>19 BY THE WITNESS:</p> <p>20 A. That would be correct, because what</p> <p>21 flagged them was, like, triple -- 300 of something.</p> <p>22 Not even in a hospital do you need 300 of something.</p> <p>23 I mean, that's what would flag them right away that</p> <p>24 something was wrong.</p>

<p style="text-align: right;">Page 114</p> <p>1 BY MR. GADDY:</p> <p>2 Q. It had to be something crazy for it to</p> <p>3 flag on this report for you to do a follow-up?</p> <p>4 A. Well, it had to be something large. I</p> <p>5 don't know if I would say crazy, but yeah.</p> <p>6 Q. Outside of being told by Anaya at some</p> <p>7 point in time for -- that -- that it -- excuse me --</p> <p>8 being told by Anaya at some point in time that at some</p> <p>9 other point in time there was some type of system in</p> <p>10 place --</p> <p>11 A. Uh-huh.</p> <p>12 Q. -- did you ever have any interaction with</p> <p>13 anybody at Walgreens regarding suspicious orders?</p> <p>14 MS. SWIFT: Object to the form and foundation.</p> <p>15 BY THE WITNESS:</p> <p>16 A. Just the computer room supervisor,</p> <p>17 Matt Nye, the one we talked about earlier.</p> <p>18 BY MR. GADDY:</p> <p>19 Q. Okay.</p> <p>20 And what, if anything, would Matt tell you</p> <p>21 about -- and -- and -- and I'm not talking about the</p> <p>22 questionable orders, the -- not -- not about these</p> <p>23 policies and this procedure here.</p> <p>24 A. Okay.</p>	<p style="text-align: right;">Page 116</p> <p>1 A. Okay.</p> <p>2 Q. I'm talking about what -- well, let me ask</p> <p>3 you this: Did Matt refer to those as suspicious</p> <p>4 orders?</p> <p>5 A. I don't recall --</p> <p>6 Q. Okay.</p> <p>7 A. -- his verbiage, no.</p> <p>8 Q. I'm ask -- what I'm trying to ask about,</p> <p>9 and -- and -- and I'm just going to be sus -- specific</p> <p>10 to the phrase "suspicious orders."</p> <p>11 A. Okay.</p> <p>12 Q. Because that's what's used here in this</p> <p>13 policy as it relates to internal audit and that's what</p> <p>14 I think you told me was on that report that the</p> <p>15 C-II -- that -- that Lori --</p> <p>16 A. Right.</p> <p>17 Q. -- who was the C-II SAIL coordinator,</p> <p>18 would get, correct?</p> <p>19 A. Correct.</p> <p>20 Q. Or -- or -- or Brook was the other one,</p> <p>21 right?</p> <p>22 A. Um-hum.</p> <p>23 Q. Did you ever have any conversations or</p> <p>24 interactions with anybody at Walgreens, other than</p>
<p style="text-align: right;">Page 115</p> <p>1 Q. But I'm asking specifically about the --</p> <p>2 the suspicious order report that you said would come</p> <p>3 into the C-II SAIL --</p> <p>4 A. Uh-huh.</p> <p>5 Q. -- or -- or the suspicious orders that's</p> <p>6 handled by internal audit.</p> <p>7 Did you have -- did you have any</p> <p>8 conversations with Matt Nye about that suspicious</p> <p>9 order report or -- or specifically the -- what</p> <p>10 Walgreens referred to as suspicious orders?</p> <p>11 MS. SWIFT: Object to the form of the question.</p> <p>12 BY THE WITNESS:</p> <p>13 A. Suspicious orders would be the query he</p> <p>14 ran, I -- that's how I understood it, and then I -- he</p> <p>15 would talk to me about those. If he couldn't get</p> <p>16 ahold of the store, he would tell me.</p> <p>17 Is that what -- the query you are talking</p> <p>18 about? No.</p> <p>19 BY MR. GADDY:</p> <p>20 Q. What you are talking about is what we've</p> <p>21 been talking about for the last hour or so?</p> <p>22 A. Um-hum.</p> <p>23 Q. Okay. So no. I'm talking about something</p> <p>24 different than that.</p>	<p style="text-align: right;">Page 117</p> <p>1 this Anaya conversation you told us about, regarding</p> <p>2 suspicious order reports or suspicious orders, and --</p> <p>3 and I'm confining it to that -- to that specific term?</p> <p>4 MS. SWIFT: Object to the form.</p> <p>5 BY THE WITNESS:</p> <p>6 A. Not that I recall.</p> <p>7 BY MR. GADDY:</p> <p>8 Q. Okay. Do you know -- do you know a Mark</p> <p>9 Betteridge?</p> <p>10 A. Yes.</p> <p>11 Q. Who is Mark and what did he do?</p> <p>12 A. He is another function manager at the DC.</p> <p>13 Q. Okay. What is his purview -- what's under</p> <p>14 his purview?</p> <p>15 A. Right now he is in NAKL mod, one of our</p> <p>16 pick mods.</p> <p>17 Q. Okay. Has he ever had any</p> <p>18 responsibilities whatsoever for controlled substances?</p> <p>19 A. I didn't really follow C-III through V and</p> <p>20 their activity when I was in receiving as a manager,</p> <p>21 so I couldn't really answer that. He may have during</p> <p>22 that frame. I don't know.</p> <p>23 Q. He never had any responsibilities over</p> <p>24 C-IIs?</p>

<p style="text-align: right;">Page 498</p> <p>1 MS. SWIFT: Object to the form.</p> <p>2 BY THE WITNESS:</p> <p>3 A. I don't recall. I'd have to look, but I</p> <p>4 take your word for it.</p> <p>5 BY MR. GADDY:</p> <p>6 Q. Well, do you remember it was a year after</p> <p>7 the Rannazzisi letter from the DEA --</p> <p>8 A. Uh-huh. Uh-huh.</p> <p>9 Q. -- saying don't do the monthly reports?</p> <p>10 A. Right.</p> <p>11 Q. And that was December 2007?</p> <p>12 A. '7.</p> <p>13 Q. Okay. So this Exhibit 14 that you were</p> <p>14 shown by your attorney where the D -- where you are</p> <p>15 acknowledging or Walgreens is acknowledging that the</p> <p>16 DEA believes the suspicious order report is</p> <p>17 inadequate, that's back in 2006, right?</p> <p>18 A. Yes.</p> <p>19 Q. And we've looked at documents today from</p> <p>20 the Walgreens internal audit department in December</p> <p>21 of 2008, two-and-a-half years after that, where</p> <p>22 Walgreens is still saying that their suspicious order</p> <p>23 monitoring program needs work and has risk involved?</p> <p>24 MS. SWIFT: Objection asked --</p>	<p style="text-align: right;">Page 500</p> <p>1 Q. All right. Now, the other thing I want to</p> <p>2 touch on just very quickly is the excessive order --</p> <p>3 A. Query.</p> <p>4 Q. -- report.</p> <p>5 Query? What would -- what would you like</p> <p>6 to call it, excessive order query?</p> <p>7 A. I don't -- I don't do that. So I just</p> <p>8 notice in here it is all called the excessive order</p> <p>9 query, I believe.</p> <p>10 Q. Okay. Well, if I say "excessive order</p> <p>11 query," you know what I'm talking about?</p> <p>12 A. Yeah, yeah.</p> <p>13 Q. Okay. So when we talked earlier, you only</p> <p>14 mentioned getting notifications from the computer room</p> <p>15 occasionally because usually I think you said Matt</p> <p>16 handled that on his own?</p> <p>17 A. Correct.</p> <p>18 Q. And that you said you generally got them</p> <p>19 from the pickers. And just a few minutes ago for the</p> <p>20 first time I heard you say a third person or position?</p> <p>21 A. The auditor.</p> <p>22 Q. Of the auditor.</p> <p>23 A. Uh-huh.</p> <p>24 Q. Okay. Is there any reason you didn't</p>
<p style="text-align: right;">Page 499</p> <p>1 BY MR. GADDY:</p> <p>2 Q. Do you recall that?</p> <p>3 MS. SWIFT: Asked and answered and beyond the</p> <p>4 scope.</p> <p>5 BY THE WITNESS:</p> <p>6 A. I don't remember the word "risk," but I do</p> <p>7 remember them saying that they had concerns about it.</p> <p>8 BY MS. SWIFT:</p> <p>9 Q. Do you remember there was a column for</p> <p>10 risk --</p> <p>11 A. Uh-huh.</p> <p>12 Q. -- and the whole thing was blacked out so</p> <p>13 I couldn't ask you about it?</p> <p>14 Do you remember that?</p> <p>15 MS. SWIFT: Object to the form.</p> <p>16 BY THE WITNESS:</p> <p>17 A. I remember there were several things</p> <p>18 blacked out on forms, but not that specific one.</p> <p>19 BY MR. GADDY:</p> <p>20 Q. And then you recall that we've looked at</p> <p>21 the cover letters of those suspicious orders, of those</p> <p>22 monthly reports that were sent to the DEA all of the</p> <p>23 way through, what was it, January of 2012, I believe?</p> <p>24 A. Oh, was it '12, '11 or '12, yeah.</p>	<p style="text-align: right;">Page 501</p> <p>1 mention that before to...?</p> <p>2 A. I just didn't think of it, yeah.</p> <p>3 Q. Okay. Was there anything that made you</p> <p>4 think of it?</p> <p>5 A. Nothing in particular.</p> <p>6 Q. Okay.</p> <p>7 A. Well, when she asked me to go</p> <p>8 step-by-step-by-step what -- what happens when the</p> <p>9 orders come in, then I was visualizing where it goes</p> <p>10 and I went, Okay, then it goes to the auditor.</p> <p>11 What -- I didn't do that before.</p> <p>12 Q. Okay. So you told us before, and tell me</p> <p>13 if I'm wrong, but that you would occasionally get</p> <p>14 notifications from Matt?</p> <p>15 A. Um-hum.</p> <p>16 Q. And that you would regularly get</p> <p>17 notifications from folks that were doing the picking?</p> <p>18 A. Well, define regularly. I don't remember</p> <p>19 saying regularly. I was saying that if something came</p> <p>20 up unusually large the pickers would bring it to me.</p> <p>21 Q. Okay.</p> <p>22 A. I don't remember saying how often.</p> <p>23 Q. I'm doing a bad job of trying to figure</p> <p>24 out where the auditors, how frequently you would get</p>

<p style="text-align: right;">Page 502</p> <p>1 reports from auditors about --</p> <p>2 A. Not frequently. It usually came from the</p> <p>3 picker.</p> <p>4 Q. Okay. Would you get them from the</p> <p>5 auditors more or less than you would get them from</p> <p>6 Matt?</p> <p>7 A. More or less what?</p> <p>8 Q. Than you would get them from Matt in the</p> <p>9 computer room?</p> <p>10 A. Oh, I would -- it would be about the same.</p> <p>11 Q. Okay. And what you're -- what you're</p> <p>12 looking for in those situations are orders that were</p> <p>13 entered by the stores in error, correct?</p> <p>14 MS. SWIFT: Object to the form.</p> <p>15 BY THE WITNESS:</p> <p>16 A. Correct.</p> <p>17 BY MR. GADDY:</p> <p>18 Q. Okay.</p> <p>19 A. Or with -- or that they needed it but I</p> <p>20 still need to know why they are ordering so much.</p> <p>21 Q. Okay. And I think that you said that</p> <p>22 there is only one situation where you remember calling</p> <p>23 them about what you think was an error --</p> <p>24 A. Uh-huh.</p>	<p style="text-align: right;">Page 504</p> <p>1 the doctors that were writing the prescriptions?</p> <p>2 MS. SWIFT: Objection; asked and answered.</p> <p>3 BY THE WITNESS:</p> <p>4 A. No.</p> <p>5 BY MR. GADDY:</p> <p>6 Q. Okay. In fact, I think you told us that</p> <p>7 you wouldn't have the ability to do any of that -- any</p> <p>8 of that type of analysis because you didn't have that</p> <p>9 information?</p> <p>10 A. That's correct.</p> <p>11 MS. SWIFT: Objection; asked and answered.</p> <p>12 BY MR. GADDY:</p> <p>13 Q. Okay. As far as the number of bottles of</p> <p>14 controlled substances, and I guess specifically</p> <p>15 Schedule II controlled substances --</p> <p>16 A. Uh-huh.</p> <p>17 Q. -- that would require folks in the</p> <p>18 computer room to do any type of flagging or</p> <p>19 notification of the stores --</p> <p>20 A. Uh-huh.</p> <p>21 Q. -- do you recall we saw the e-mail where</p> <p>22 Matt in the computer room indicated that that number</p> <p>23 was 100 bottles?</p> <p>24 MS. SWIFT: Object to the form.</p>
<p style="text-align: right;">Page 503</p> <p>1 Q. -- and finding out that, in fact, it was</p> <p>2 not an error?</p> <p>3 A. Correct.</p> <p>4 Q. So most of the time that you would see one</p> <p>5 of these incredibly large numbers flag on this report,</p> <p>6 something like 300 where they really meant three --</p> <p>7 A. Uh-huh.</p> <p>8 Q. -- you would call the store and they would</p> <p>9 confirm for you that it was an error, correct?</p> <p>10 A. Correct.</p> <p>11 Q. You weren't doing any analysis of the</p> <p>12 population size that serviced these stores, correct?</p> <p>13 A. No.</p> <p>14 MS. SWIFT: Objection asked and answered.</p> <p>15 BY MS. SWIFT:</p> <p>16 Q. You weren't doing any analysis of the</p> <p>17 geographical locations of the patients or the</p> <p>18 prescribers as it related to the store, is that</p> <p>19 correct?</p> <p>20 MS. SWIFT: Objection; asked and answered.</p> <p>21 BY THE WITNESS:</p> <p>22 A. No, that's correct, yes.</p> <p>23 BY MR. GADDY:</p> <p>24 Q. Okay. You weren't doing any analysis of</p>	<p style="text-align: right;">Page 505</p> <p>1 BY THE WITNESS:</p> <p>2 A. Well, it started -- it started at 35. I</p> <p>3 mean, we saw different quantities in there, but the</p> <p>4 most current e-mail indicated that it would be a</p> <p>5 hundred, yeah.</p> <p>6 BY MR. GADDY:</p> <p>7 Q. Okay. And so anything under a hundred,</p> <p>8 according to Matt, he wasn't doing any phone calls or</p> <p>9 any follow-ups on?</p> <p>10 MS. SWIFT: Object to the form and the</p> <p>11 foundation, asked and answered and this is beyond the</p> <p>12 scope --</p> <p>13 BY THE WITNESS:</p> <p>14 A. I don't know.</p> <p>15 MS. SWIFT: -- of the redirect.</p> <p>16 BY THE WITNESS:</p> <p>17 A. I don't know what -- what he was -- he</p> <p>18 wasn't telling me about it, let's put it that way. I</p> <p>19 don't know what else he did with it.</p> <p>20 BY MS. SWIFT:</p> <p>21 Q. Okay. And so under that system, there</p> <p>22 could be an order for 90 bottles of a hundred-count</p> <p>23 pill for a Schedule II controlled substance --</p> <p>24 A. Uh-huh.</p>